


UNITED STATE DISTRICT COURT FOR THE
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

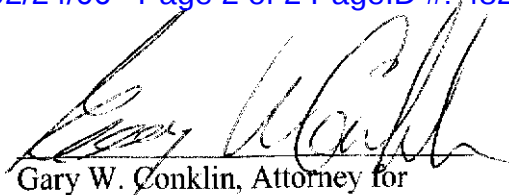
FILED
FEB 24 2006

CLERK

UNITED STATES OF AMERICA,)	Case No.: CR 05-M34-03
Plaintiff,)	
vs.)	MOTION FOR PERMISSION TO
KRISTEN LYNNE SCHULZ, BENJAMIN)	FILE TARDY OBJECTIONS TO
MOON, AND STEVEN CRAIG)	PRE-SENTENCE REPORT IN
ALEXANDER)	BEHALF OF DEFENDANT
Defendant)	ALEXANDER
)	

Comes now Gary W. Conklin, Attorney for Steven Craig Alexander, and states as follows: That at the time of the entry of Defendant's plea in December 2005, the Court orally set dates for the Pre-sentence Report and Objections thereto. Counsel recorded those dates. Apparently later when the Pre Sentence Report was received there was a note from the author of the report that the dates had been changed. Counsel read the note and forgot to change his calendar. Counsel wishes to file several objections to the Pre-sentence Report and believes that no unreasonable delay or undue burden will result. The objections will be delivered to the Ms. Shelly Schenkel, Senior U.S. Probation/Pretrial Services Officer on February 25, 2006 .

Wherefore, Counsel hereby moves that the Court allow Counsel to file his tardy objections to the Pre-Sentence Report on file herein by delivering the same to Ms. Shelly Schenkel, Senior U.S. Probation/Pretrial Services Officer on February 25, 2006 and to have them considered by the Court at the sentencing hearing herein.

Dated this 24th day of February 2006.



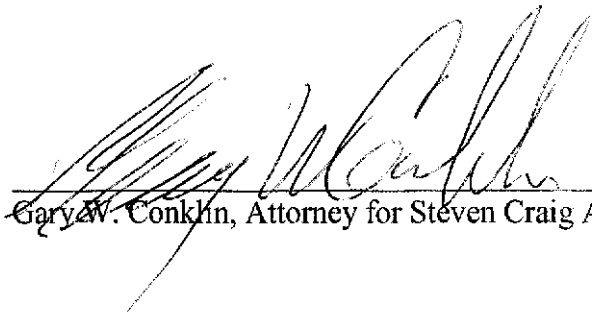
Gary W. Conklin, Attorney for
Defendant Steven Craig Alexander
300 N. Dakota Ave. # 608
Sioux Falls SD 57104
605-978-0036
605-978-0064 FAX

CERTIFICATE OF SERVICE

This is to certify that on this 24th day of February 2006 by, I personally delivered a copy of the foregoing Motion to File Tardy Objections to Pre-Sentence Report In Behalf of Defendant Alexander to the receptionist at the office of:

Mr. John Haak, Attorney
Office of United States Attorney
PO Box 5073
Sioux Falls SD 57117-5073

Ms. Shelly Schenkel, Senior U.S. Probation/Pretial Services Officer
Phillips Centre, Suite 101
Sioux Falls SD 57104-6323



Gary W. Conklin, Attorney for Steven Craig Alexander